

Honorable James Robart

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON, SEATTLE

UNITED STATES OF AMERICA,)	No. CR19-117 JLR
)	
Plaintiff,)	DEFENSE PROPOSED
)	VOIR DIRE QUESTIONS
v.)	
)	
SHAWNA REID,)	
Defendant.)	
_____)	

1. Have you read or heard about the murder of Thomas Wales, an assistant United States attorney, which occurred in October of 2001?
2. Are you familiar with the Queen Anne Hill neighborhood in Seattle?
3. Have you or a family member ever worked for law enforcement or the office of a prosecuting attorney?
4. Have you ever served on a state or federal grand jury?
- 5.. Do you have any opinions, either positive or negative about how the FBI operates as a law enforcement agency?
- 6.. Would you be able to judge the credibility of an FBI agent witness or a police officer in the same way as any other witness?
7. Would you tend to give greater weight or credibility, even slightly, to the testimony of a law enforcement officer merely because he or she is testifying for the government?
8. Have you ever had to testify under oath? If so, were you ever asked about what you might have said on another occasion?

9. If you were charged with a crime and made a statement, how would you want that statement recorded?
10. How would you want the most important statement of your life recorded for accuracy?
11. Have you ever said something that was misunderstood or misconstrued?
12. You may hear evidence in this case, that the defendant has used illegal drugs in the past. Would such evidence prevent you from being a fair and impartial juror or not applying the presumption of innocence to Ms. Reid?
13. Do you know anyone who has post-traumatic stress disorder, is bipolar, or who suffers from depression?
14. Do you know anyone who takes medication for treatment of mental illness?
15. Would evidence that Ms. Reid has post-traumatic stress disorder, is bipolar, and suffers from depression prevent you from being a fair and impartial juror or not applying the presumption of innocence to her?
16. Do you know anyone has been the victim of domestic violence?
17. Would evidence that the defendant has been the victim of domestic violence prevent you from being a fair and impartial juror?
18. Have you received a coronavirus vaccination?
19. If not, what is the reason you have not been vaccinated?
20. Have you ever had the task of taking notes about what is said in an interview or meeting?
21. Have you ever been accused of something you did not do?
22. Are you familiar with the Fifth Amendment constitutional protection against a person being compelled to incriminate him/herself?
23. Do you think there are circumstances in which an innocent person would exercise his/her Fifth Amendment right against self-incrimination?
24. Is anyone familiar with the idea of a witness testifying under a grant of immunity? Or testifying because a compulsion order requires it?

Respectfully submitted this 6th day of July, 2021.

/s/ Michael Nance, WSBA #13933

/s/ Robert Gombiner, WSBA #16059

Attorneys for Shawna Reid

Certificate of Service

I hereby certify that on the 6th day of July, 2021, I electronically filed the foregoing with the clerk of the court using the CM/ECF system. Notice of this filing will be sent electronically to counsel of record for other parties.

/s/ Michael Nance

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